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9 **Attorneys for Plaintiff**
10 **J & J Sports Productions, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 **J & J Sports Productions, Inc.,**

14 **Plaintiff,**

15 **vs.**

16 **Jose O. Lopez,**

17 **Defendant.**

18 **CASE NO. 3:14-cv-05131-HSG**

19 **STIPULATION OF DISMISSAL OF**
20 **PLAINTIFF'S COMPLAINT AGAINST**
21 **DEFENDANT JOSE O. LOPEZ, individually**
22 **and d/b/a LOPEZ APPLIANCES**

23 **IT IS HEREBY STIPULATED** by and between Plaintiff J & J SPORTS PRODUCTIONS,
24 INC. and Defendant JOSE O. LOPEZ, individually and d/b/a LOPEZ APPLIANCES, that the above-
25 entitled action is hereby dismissed **without prejudice** against JOSE O. LOPEZ, individually and d/b/a
26 LOPEZ APPLIANCES and subject to the Court's jurisdiction to enforce the settlement agreement
27 reached between the Parties.

28 **IT IS FURTHER STIPULATED** that provided no Party referenced above has filed a
motion to reopen this action by September 7, 2015, the dismissal shall be deemed to be **with
prejudice**.

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1 This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1). Each Party
2 referenced-above shall bear its own attorneys' fees and costs.
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6 Dated:

7 **LAW OFFICES OF THOMAS P. RILEY, P.C.**
8 By: Thomas P. Riley
9 Attorneys for Plaintiff
10 J & J SPORTS PRODUCTIONS, INC.
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13 Dated:

14 **AXCEL LAW PARTNERS, LLP**
15 By: Craig C. Daniels
16 Attorneys for Defendant
17 JOSE O. LOPEZ, individually and d/b/a LOPEZ
18 APPLIANCES
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23 **IT IS SO ORDERED:**

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25 
26 The Honorable Haywood S. Gilliam, Jr.
27 United States District Court
28 Northern District of California

Dated: August 28, 2015

PROOF OF SERVICE (SERVICE BY MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On August 4, 2015, I caused to serve the following documents entitled:

**STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT AGAINST
DEFENDANT JOSE O. LOPEZ, individually and d/b/a LOPEZ APPLIANCES**

On all parties referenced by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was addressed to:

Mr. Craig C. Daniel, Esq.
Mr. Jayson Singh Sohi, Esq.
AXCEL LAW PARTNERS, LLP
4 Embarcadero Center, 14th Floor
San Francisco, CA 94111

(Attorneys for Defendant)
(Attorneys for Defendant)

The fully sealed envelope with pre-paid postage was thereafter placed in our law firm's outbound mail receptacle in order that this particular piece of mail could be taken to the United States Post Office in South Pasadena, California later this day by myself (or by another administrative assistant duly employed by our law firm).

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on August 28, 2015, at South Pasadena, California.

Dated: August 4, 2015

VANESSA VENTURA